09 Civ. 1410 (KAM) (RLM)

EASTERN DISTRICT OF NEW YORK
ROSS UNIVERSITY SCHOOL OF MEDICINE, LTD.,
Plaintiff,
– against –
BROOKLYN-QUEENS HEALTH CARE, INC. and WYCKOFF HEIGHTS MEDICAL CENTER,
Defendants.

PLAINTIFF ROSS UNIVERSITY'S APPENDIX TO RESPONSE TO DEFENDANTS' 56.1 STATEMENT OF UNDISPUTED FACTS & ADDITIONAL FACTS REQUIRING THE DENIAL OF SUMMARY JUDGMENT

VOLUME 2

Romero deposition exhibit 9 – Romero supplemental declaration 04/04/08	I
Ross 1003 – original 1997 Wyckoff agreement	2
Ross 031951 – amendment to Wyckoff agreement	3
Romero deposition exhibit 18 – Ross 023701 – email	4
Romero deposition exhibit 2 – Ross 031314 – letter to Nancy Perri - investment opportunity	5
Romero deposition exhibit 1 – Ross 0607 – letter to Yife Tien - investment opportunity	e
Romero deposition exhibit 3 – promissory note	7
AUC affiliation agreement	8
Garg deposition exhibit 6 – Caritas weekly cash projections	9
Declaration of Gio	10
Romero deposition exhibit 10 – Ross 009216 – email between Perri and Romero	11
Romero deposition exhibit 11 – Ross 009186 – email between Perri and Romero	12

Romero deposition exhibit 16 – Ross 009019 – email	13
Ross 009182 – email between Perri and Romero	14
Romero deposition exhibit 12 – Ross 009177 – email	15
Romero deposition exhibit 13 – BQHC 24771 – email	16
Ross 009046 – email	17
Ross 033055 – email	18
Ross 008943 – email	19
Ross 008748 – email	20
Romero deposition exhibit 19 – Ross 0630 – email with attachment	21
Romero deposition exhibit 20 – Ross 008477 – email with attached agreement	22
Romero deposition exhibit 21 – Ross 0614 – email with attached agreement	23
Romero deposition exhibit 5 – Ross 0056	24
Romero deposition exhibit 6 – Ross 0052	25
Romero deposition exhibit 7 – BQHC 42911 – second amendment to affiliation agreement	26
Ross 015142 – email	27
BQHC 48037 – email	28
Rucigay deposition exhibit 18 - BQHC 13452 – memo	29
BQHC 39559 – email	30
Ross 031619 – email	31
Ross 031623 – fax confirmation	32
BQHC 43171 – email	33
Rucigay deposition exhibit 17 – BQHC 00489 - administrative services agreement	34
Singleton deposition exhibit 7 – BQHC 00489	35
08/08/11 Loughlin letter	36

Rucigay deposition exhibit 1- BQHC 03718 – Wyckoff board meeting minutes 02/09/0	37
Rucigay deposition exhibit 4 – BQHC 03782 – Wyckoff board meeting minutes 12/14/06	38
Rucigay deposition exhibit 6 – BQHC 00430 – affiliate subordination agreement	39